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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE NATIONAL SECURITY AGENCY TELECOMMUNICATIONS RECORDS LITIGATION

This Document Relates To:

***McMurray v. Verizon Comm., Inc.*, No. 09-cv-0131-VRW**

MDL Docket No. 06-1791 (VRW)

STIPULATION AND [PROPOSED] ORDER REGARDING HEARING DATE AND BRIEFING SCHEDULE ON GOVERNMENT'S AND TELECOMMUNICATION CARRIER DEFENDANTS' MOTIONS TO DISMISS PLAINTIFFS' COMPLAINT

[CIVIL L.R. 7-11]

Chief Judge Vaughn R. Walker

RECITAL

On March 13, 2009, the Government Defendants filed a Motion to Dismiss Plaintiffs' Complaint in 09-cv-0131-VRW and noticed the motion for oral argument on May 14, 2009. Dkt. No. 11 in 09-cv-0131-VRW. On March 16, 2009, the Carrier Defendants filed Motions to Dismiss Plaintiffs' Complaint and also noticed their motions for May 14, 2009. Dkt. No. 12, 16 in 09-cv-0131-VRW.

STIPULATION

1. The *McMurray* Plaintiffs, the Government Defendants, and the Carrier Defendants in 09-cv-0131-VRW, through their undersigned counsel, hereby request:

   a. That the *McMurray* Plaintiffs' briefs in response to the pending motions shall be filed on or before May 7, 2009;

   b. That the Government Defendants' and the Carrier Defendants' briefs in reply shall be filed on or before May 21, 2009; and

   c. That the Government Defendants' and the Carrier Defendants' Motions to Dismiss be heard on June 3, 2009 at 10:30 a.m.

2. By entering into this Stipulation, neither Plaintiffs nor Defendants waive any procedural or substantive defenses, rights or objections, including, but not limited to, the right to challenge personal jurisdiction over any particular Defendant.

April 15, 2009

Respectfully submitted,

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DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B.

I, STEVEN E. SCHWARZ, hereby declare pursuant to General Order 45, § X.B., that I have obtained the concurrence in the filing of this document from the other signatories listed below.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Executed on April 15, 2009, at Chicago, IL.

/s/ Steven E. Schwarz
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By: /s/ Randolph D. Moss
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[PROPOSED] ORDER

It is hereby **ORDERED** that oral argument on the Government's and the Carrier Defendants' Motions to Dismiss (Dkt. No. 11-17) shall be heard on June 3, 2009 at 10:30 a.m. It is also **ORDERED** that Plaintiffs' oppositions to such motions shall be due on or before May 7, 2009, and that the Government's and Carrier Defendants' replies shall be due on or before May 21, 2009.

IT IS SO ORDERED,

Dated: ___________________ , 2009

____
Hon. Vaughn R. Walker
United States District Chief Judge